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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

ROBERT CUTLER and NANCY
CUTLER, a married couple, and ROBERT
TICE, an individual,

Plaintiffs,

v.

TYTUS HARKINS, an individual citizen
of the State of Montana, JASON WHITE,
an individual citizen of the State of
Washington, HARTMAN WRIGHT
GROUP, LLC a Colorado limited liability
company, HARTMAN WRIGHT
PROJECT MANAGEMENT LLC, a
Colorado limited liability company,
PLEASANT HILL MHP HOLDING,
LLC, a Georgia limited liability company,
and JOHN & JANE DOES, 1-10 who are
either natural persons or legal entities,
currently unknown to the Plaintiffs,

Defendants.

Case No: 3:18-CV-01692-IM

DECLARATION OF TERRY
SCANNELL IN SUPPORT OF
PLAINTIFFS' MOTION FOR
ORDER TO COMPEL ANSWERS
TO INTERROGATORIES

I, Terry Scannell, being first duly sworn, depose and say:

1. I am the owner and senior attorney of Scannellaw, counsel of record for the Plaintiffs. I am over the age of 18 and have knowledge of the facts stated herein and I am competent to testify concerning the same. The following information is provided in support of Plaintiffs Motion for Order to Compel Answers to Interrogatories.
2. On November 27, 2019, Plaintiffs' Attorney served Plaintiffs' First Interrogatories and First Requests for Production on counsels for the Defendants by email and first-class mail.
3. Defendants have turned over documents, but despite repeated requests and the promise to do so upon entry of the Protective Order have not turned over the information that is responsive to the Interrogatories
4. Members of the staff of Scannellaw reviewed, analyzed, and catalogued the information provided in the documents turned over to Plaintiffs' attorneys from the Defendants in response to the Requests for Production.
5. In reviewing the documents produced, the Plaintiffs found evidence of approximately seventy (70) entities and twenty (20) bank accounts that appear to be affiliated with Defendants.
6. There is also evidence in the production that shows money moved between these various entities. For example, in the bank statements provided by the Defendants, on January 27, 2017, \$10,000, and on February 22, 2017, \$15,000, was transferred from Hartman Wright Group, LLC's Community First Credit Union Account No. 268350 to White Acquisitions, LLC. Defendant White and Defendant Tytus Harkins are Managing and founding Members of these entities.

7. There are numerous additional transfers of significant volumes of money like the two mentioned above.
8. Defendants produced select financial statements in the document production turned over to Plaintiffs and, in reviewing that production, Plaintiffs found evidence of additional accounts, the records for which have not been produced.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED this 21st day of July 2021

/s/ Terry Scannell
Terry Scannell

CERTIFICATE OF SERVICE

I hereby certify that on July 21, 2021, I electronically filed the foregoing document with the United States District Court for the State of Oregon using the CM/ECF system. I certify that all participants in this case who are registered CM/ECF users had service accomplished by the USDC CM/ECF system, and that if they are not registered users of this system this filing was sent via the US Postal Service, Priority Mail to them at their address of record, and their name and address is listed below.

Tytus Harkins
1927 Holstein Ln
Laurel MT 59045

Dated: July 21, 2021

/s/ Terry Scannell
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